

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

ELISEO ESCAMILLA,

Plaintiff,

v.

**EMERALD CONCRETE, INC.,
MARTIN KEANE, Individually, and
JERRY KEANE, Individually,**

Defendants.

)
)
) **No. 08 CV 2608**
)
) **Judge John W. Darrah**
)
) **Magistrate Judge Schenkier**
)
)
)
)

NOTICE OF MOTION

TO: Marty Denis
BARLOW, KOBATA & DENIS
525 W. Monroe Street, Suite 2360
Chicago, Illinois 60661

On Thursday, June 26, 2008 at 9:00 a.m. or as soon thereafter as counsel may be heard, I shall appear before Judge Darrah in Room 1203, or in the courtroom usually occupied by said judge in the United States District Court for the Northern District of Illinois, Eastern Division, at the Dirksen Federal Building at 219 S. Dearborn Street, Chicago, Illinois, and then and there present the attached Agreed Motion to Extend Time To Answer Or Otherwise Plead.

Dated: June 20, 2008

Respectfully submitted,

EMERALD CONCRETE, INC., MARTIN
KEANE, Individually, and JERRY KEANE,
Individually

By: s/Davi L. Hirsch
DAVI L. HIRSCH (ARDC #6182757)
KLEIN DUB & HOLLEB, LTD.
660 LaSalle Place, Suite 100
Highland Park, Illinois 60035
(847) 681-9100
dhirsch@labor-law.com

Attorneys for Defendants

CERTIFICATE OF SERVICE

I, Davi L. Hirsch, certify that I served this Notice of Motion and Agreed Motion to
Extend Time To Answer Or Otherwise Plead on:

Marty Denis
BARLOW, KOBATA & DENIS
525 W. Monroe Street, Suite 2360
Chicago, Illinois 60661

via regular U.S. Mail, postage prepaid on or before 5:00 p.m. on June 20, 2008.

By: s/Davi L. Hirsch